

**PUBLIC VERSION**

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of )  
 )  
WORLDCALL INTERCONNECT, INC. )  
a/k/a EVOLVE BROADBAND, )  
Complainant ) File No. EB-14-MD-011  
 )  
v. )  
 )  
AT&T MOBILITY LLC )  
Defendant )

**INFORMATION DESIGNATION PURSUANT TO RULEs 1.726(d) AND (e)**

Worldcall Interconnect, Inc. (“WCX”) hereby submits this information designation in accordance with Section 1.726(d) of the Federal Communications Commission’s (“Commission”) Rules, 47 C.F.R. § 1.726(d).

**Individuals Believed to Have First Hand Knowledge, Rule 1.726(d)(1)**

Pursuant to Section 1.726(d)(1) of the Commission’s Rules, 47 C.F.R. § 1.726(d)(1), set forth below are the names, addresses and positions of the individuals who have firsthand knowledge of facts alleged with particularity in the Reply, along with a description of the facts within any such individual’s knowledge.

1. Lowell Feldman  
CEO  
WCX  
1250 S. Capital of Texas Hwy  
Bldg. 2-235  
West Lake Hills, TX 78746

Subjects: All factual assertions in the complaint, as described in more detail in the Reply Declaration of Lowell Feldman.

2. Martyn Roetter

Consultant to WCX  
144 Beacon St.  
Boston, MA 02116

Subjects: Information described in the Reply Declaration of Martyn Roetter, including contents of the proposed RWA/WCX and AT&T roaming agreements; Terms and Conditions in executed and proposed roaming agreements; Retail mobile data rates; Status and expectations for the future of M2M and Internet of Things applications and other sources of mobile traffic; Criteria of commercial reasonableness in and other contents of FCC's Data Roaming Order; History of Band Class 17 and Lower 700 MHz Non-Interoperability; Trends in performance and costs of mobile broadband technologies; Evidence produced in finding of discrimination in roaming agreements by Canadian incumbents by the CRTC (Canadian Radio-television and Telecommunications Commission).

3. George Meadors

Assistant Vice President of Alliance/Partnership, Wireless Roaming Strategy  
AT&T Mobility, LLC  
1025 Lenox Park Blvd. N.E.  
Suite D882  
Atlanta, GA 30319

Subjects: Parties' negotiations, mediation, and settlement efforts.

4. Carri Bennet

General Counsel  
Rural Wireless Association  
P.O. Box 50551  
Arlington, VA 22205-5551

Subjects: Creation of the Rural Wireless Association Model Agreement

5. Daryl Zakov

Assistant General Counsel  
Rural Wireless Association  
P.O. Box 50551  
Arlington, VA 22205-5551

6. Subjects: Creation of the Rural Wireless Association Model Agreement

7. Tonya Sullivan

CEO  
Rural Wireless Association  
P.O. Box 50551  
Arlington, VA 22205-5551

Subjects: Creation of the Rural Wireless Association Model Agreement

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Documents, Data Compilations, and Tangible Things, Rule 1.726(d)(2)**

Pursuant to Section 1.726(d)(2) of the Commission's Rules, 47 C.F.R. § 1.726(d)(2), attached is a log describing all documents, data compilations and tangible things in the WCX's possession, custody, or control that are relevant to the facts alleged with particularity in the Reply.

WCX notes that two of the documents contain Highly Confidential Information (Document Nos. 84 and 85) as that term is defined in the Parties' Protective Order. Additionally, the log itself contains Highly Confidential Information (the name of a carrier with whom WCX is negotiating for roaming), and thus the public version of the log is being filed in redacted form.

**Identification of Persons and Documents, Rule 1.726(d)(3)**

This information designation was prepared by WCX's outside counsel in cooperation with WCX's CEO, Lowell Feldman. First, counsel and Mr. Feldman identified all individuals with first-hand knowledge of the relevant facts. The materials set forth in the document log were then collected from the following sources: the files of Lowell Feldman and Martyn Roetter, WCX's two experts. Mr. Feldman and Mr. Roetter collected the public source materials cited in their declarations.

**Documents Relied Upon, Rule 1.726(e)**

Pursuant to Section 1.726(e) of the Commission's Rules, 47 C.F.R. § 1.724(e), copies of the affidavits, documents, data compilations and tangible things in WCX's possession, custody, or control

upon which WCX relies or intends to rely in support of the facts alleged and legal arguments made in the Reply are attached as exhibits to the Declarations of Lowell Feldman and Martyn Roetter, and the Reply's Legal Analysis.

November 21, 2014

Respectfully submitted,

/s/ Matthew A. Henry  
Matthew A. Henry  
[henry@dotlaw.biz](mailto:henry@dotlaw.biz)  
W. Scott McCollough  
[wsmc@dotlaw.biz](mailto:wsmc@dotlaw.biz)  
McCollough|Henry PC  
1250 S. Capital of Texas Hwy, Bldg 2-235  
West Lake Hills, TX 78746  
Tel: 512.888.1114  
Fax: 512.692.2522

*Counsel for Worldcall Interconnect, Inc.*

Document No	Document/Thing Description	Date Prepared	Author (From)	Recipient(s)	Location	Relevance
69	One M2M Webinar 1	10/16/14	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
70	One M2M Webinar 2	10/30/14	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
71	3GPP Standard Technical Specifications	10/01/14	3GPP	Lowell Feldman	<a href="http://www.etsi.org/deliver/etsi_ts/13_332/01/10/09/01.pdf">http://www.etsi.org/deliver/etsi_ts/13_332/01/10/09/01.pdf</a>	Relevant M2M industry background
72	One M2M Technical Report 0001	09/23/13	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
73	One M2M Technical Report 0002 - Architecture Analysis Part 1	07/28/13	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
74	One M2M Technical Report 0003 - Architecture Analysis Part 2	07/28/13	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
75	One M2M Technical Specification - Security Solutions	08/01/14	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
76	Article - ATT Blows away connected device numbers in Q3	10/22/14	ATT	Lowell Feldman	<a href="http://www.bloomberg.com/bcgv/2014/10/22/att-blows-away-connected-device-numbers-in-q3/">http://www.bloomberg.com/bcgv/2014/10/22/att-blows-away-connected-device-numbers-in-q3/</a>	ATT M2M Material
77	Brochure - ATT Machine to Machine	2012	ATT	Lowell Feldman	<a href="http://www.business.att.com/content/productbrochures-machine-to-machine.pdf">http://www.business.att.com/content/productbrochures-machine-to-machine.pdf</a>	ATT M2M Material
78	Brochure - ATT Smartgrid	2010	ATT	Lowell Feldman	<a href="http://www.business.att.com/content/productbrochures/ATT_Smartgrid_brochure_final.pdf">http://www.business.att.com/content/productbrochures/ATT_Smartgrid_brochure_final.pdf</a>	ATT M2M Material
79	One M2M Technical Specification Report 0002 - Requirements	10/17/13	OneM2M org	Lowell Feldman	Available for download as indicated on the document	Relevant M2M industry background
80	Sierra Wireless AirPrime AR Series Automotive Wireless Modules	2014	Sierra Wireless	Lowell Feldman	<a href="http://www.sierrawireless.com/-/media/M2M_Ecosystem/Information/Series/datasheet.aspx">http://www.sierrawireless.com/-/media/M2M_Ecosystem/Information/Series/datasheet.aspx</a>	M2M Ecosystem Information
81	Sierra Wireless AirPrime WP Series Datasheet	2014	Sierra Wireless	Lowell Feldman	<a href="http://www.sierrawireless.com/-/media/Products/Services/Airprime_Wireless_Modules/Smart_Modules/-/media/Data%20Sheet/AirPrime_datasheets/AirPrime_WP_Series_datasheet.aspx">http://www.sierrawireless.com/-/media/Products/Services/Airprime_Wireless_Modules/Smart_Modules/-/media/Data%20Sheet/AirPrime_datasheets/AirPrime_WP_Series_datasheet.aspx</a>	M2M Ecosystem Information
82	Sierra Wireless AirPrime Legato Platform	2014	Sierra Wireless	Lowell Feldman	<a href="http://www.sierrawireless.com/-/media/Products/Services/Airprime_Wireless_Modules/Smart_Modules/-/media/Data%20Sheet/AirPrime_datasheets/SW_AirPrime_Legato_WP.aspx">http://www.sierrawireless.com/-/media/Products/Services/Airprime_Wireless_Modules/Smart_Modules/-/media/Data%20Sheet/AirPrime_datasheets/SW_AirPrime_Legato_WP.aspx</a>	M2M Ecosystem Information
83	Sierra Wireless - Open at Application Framework Datasheet	2012	Sierra Wireless	Lowell Feldman	<a href="http://www.sierrawireless.com/-/media/Products/Services/Airprime_Wireless_Modules/Smart_Modules/-/media/Data%20Sheet/AirPrime_datasheets/SW_Open%20WF.aspx">http://www.sierrawireless.com/-/media/Products/Services/Airprime_Wireless_Modules/Smart_Modules/-/media/Data%20Sheet/AirPrime_datasheets/SW_Open%20WF.aspx</a>	M2M Ecosystem Information
84	[BEGIN HIGHLY CONFIDENTIAL] ***** [END HIGHLY CONFIDENTIAL] - WCX Intercarrier Roamer Service Agreement - Draft Email - Current status of roaming negotiations between [BEGIN HIGHLY CONFIDENTIAL] ***** [END HIGHLY CONFIDENTIAL] and WCX	06/18/14	Lowell Feldman	Lowell Feldman	Lowell Feldman's records	WCX negotiations with non ATT large wireless carrier for roaming
85	REPLY COMMENTS OF RURAL WIRELESS ASSOCIATION, INC	11/12/14	Lowell Feldman	Lowell Feldman	Lowell Feldman's email account	WCX negotiations with non ATT large wireless carrier for roaming
86	Article on T-Mobile	01/08/14	BGR	Martyn Roeter	<a href="http://bgr.com/2014/01/08/t-mobile-strategy-analysis/">http://bgr.com/2014/01/08/t-mobile-strategy-analysis/</a>	Establish expert credentials
87	Stopthecap.com Article	10/22/14	Stopthecap	Martyn Roeter	<a href="http://stopthecap.com/2014/10/22/t-mobile-tt-goues-us-data-earning-rates-15-higher-average/">http://stopthecap.com/2014/10/22/t-mobile-tt-goues-us-data-earning-rates-15-higher-average/</a>	AT&T's proposed roaming rates and terms
88	COMMENTS OF CELLULAR SOUTH, INC ON PETITION FOR EXPEDITED DECLARATORY RULING FILED BY T-MOBILE USA, INC	07/10/14	Cellular South	Martyn Roeter	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521374705">http://apps.fcc.gov/ecfs/document/view?id=7521374705</a>	Reasonableness of AT&T's terms
89	COMMENTS OF NTELLOS HOLDINGS CORP IN SUPPORT OF PETITION FOR EXPEDITED DECLARATORY RULING OF T-MOBILE USA, INC	07/10/14	Nebos Holdings	Martyn Roeter	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521374768">http://apps.fcc.gov/ecfs/document/view?id=7521374768</a>	Reasonableness of AT&T's terms
90	REPLY COMMENTS OF RURAL WIRELESS ASSOCIATION, INC	08/20/14	RWA	Martyn Roeter	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521785060">http://apps.fcc.gov/ecfs/document/view?id=7521785060</a>	Reasonableness of AT&T's terms
91	ReplyComments of the Bhooston Rural Carriers, WT Docket No 05-265	08/20/14	Bhooston Ruural Carriers	FCC	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521783632">http://apps.fcc.gov/ecfs/document/view?id=7521783632</a>	Reasonableness of AT&T's proposed terms
92	ReplyComments of the Competitive Carriers Association, WT Docket No 05-265	08/20/14	Competitive Carriers Association	FCC	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521785689">http://apps.fcc.gov/ecfs/document/view?id=7521785689</a>	Reasonableness of AT&T's proposed terms
93	US Machine-to-Machine (M2M) Communications Markets Whitepaper/Frost and Sullivan.pdf	07/05/05	Frost & Sullivan		<a href="http://www.business.att.com/content/whitepaper/M2M_ControlCenter_WhitePaper_Frost_and_Sullivan.pdf">http://www.business.att.com/content/whitepaper/M2M_ControlCenter_WhitePaper_Frost_and_Sullivan.pdf</a>	AT&T's knowledge (or claimed lack thereof) of M2M and Internet of Things

Document No	Document/Thing Description	Date Prepared	Author (From)	Recipient(s)	Location	Relevance
94	AT&T M2M (Machine to Machine) Communications Snapshot Article on AT&T and M2M	06/01/09	AT&T Investors' Business Daily	Martyn Roettler	<a href="http://www.att.com/Common/about_us/files/pdf/M2M_Snapshot.pdf">http://www.att.com/Common/about_us/files/pdf/M2M_Snapshot.pdf</a>	AT&T's knowledge (or claimed lack thereof) of M2M and Internet of Things
95	Article on AT&T and M2M	09/30/2014	Infonetics Research	Martyn Roettler	<a href="http://news.investors.com/technology/09/01/4719579.att.m2m.strategy.clicking.with.connected.devices.html">http://news.investors.com/technology/09/01/4719579.att.m2m.strategy.clicking.with.connected.devices.html</a>	AT&T's knowledge (or claimed lack thereof) of M2M and Internet of Things
96	Article on AT&T and M2M	05/29/14	Infonetics Research	Martyn Roettler	<a href="http://www.infonetics.com/2014/m2m/service-provider-leadership-analysis.asp">http://www.infonetics.com/2014/m2m/service-provider-leadership-analysis.asp</a>	AT&T's knowledge (or claimed lack thereof) of M2M and Internet of Things
97	Article on AT&T LTE deployment	09/15/14	AT&T	Martyn Roettler	<a href="http://www.geek.com/mobile/att-announces-lte-launch-for-september-18-1421817/">http://www.geek.com/mobile/att-announces-lte-launch-for-september-18-1421817/</a>	Available roaming partners
98	Article on Verizon LTE deployment	11/30/12	Verizon	Martyn Roettler	<a href="http://www.verizonwireless.com/news/article/2010/12/pr20101130a.html">http://www.verizonwireless.com/news/article/2010/12/pr20101130a.html</a>	Available roaming partners
99	Article on T-Mobile LTE deployment	03/26/13	The Verge	Martyn Roettler	<a href="http://www.theverge.com/2013/3/26/4148734/t-mobile-lte-network-live">http://www.theverge.com/2013/3/26/4148734/t-mobile-lte-network-live</a>	Available roaming partners
100	Article on LTE speed vs other technologies	06/18/13	Phonearena.com	Martyn Roettler	<a href="http://www.phonearena.com/news/sites-show-at-ts-lte-network-is-fastest-lte-site_id-4209">http://www.phonearena.com/news/sites-show-at-ts-lte-network-is-fastest-lte-site_id-4209</a>	Feasibility of inferior technologies
101	AT&T webpage on AT&T's network	07/06/05	AT&T	Martyn Roettler	<a href="http://www.att.com/network/en/index.html#id=att_mpapD3k1">http://www.att.com/network/en/index.html#id=att_mpapD3k1</a>	Availability of LTE
102	iPhone specifications	07/06/05	gsmarena.com	Martyn Roettler	<a href="http://www.gsmarena.com/apple_iphone_6_6378.php">http://www.gsmarena.com/apple_iphone_6_6378.php</a>	Availability of LTE devices
103	Samsung Galaxy specifications	07/06/05	Samsung	Martyn Roettler	<a href="http://www.samsung.com/us/mobile/cell_phones/SM-G900P7KA8PR">http://www.samsung.com/us/mobile/cell_phones/SM-G900P7KA8PR</a>	Availability of LTE devices
104	Article on Sprint network deployment	09/29/14	Fiercewireless	Martyn Roettler	<a href="http://www.fiercewireless.com/story/hospective_sprint_needs_step_its_25gbs-lte_deployment/2014/09/29">http://www.fiercewireless.com/story/hospective_sprint_needs_step_its_25gbs-lte_deployment/2014/09/29</a>	Availability of alternative roaming partners
105	Biography of Joseph Stiglitz	06/23/05	Nobelprize.org Rural Telecommunications Group	Martyn Roettler	<a href="http://www.nobelprize.org/nobel_prizes/economics/laurates/2001/stiglitz/bio.html">http://www.nobelprize.org/nobel_prizes/economics/laurates/2001/stiglitz/bio.html</a>	Authority of author on economics of roaming
106	Comments of Rural Telecommunications Group, WT Docket No 13-135	06/17/13	Cisco	Martyn Roettler	<a href="http://apps.fcc.gov/ecfs/document/vie/w?d7520924139">http://apps.fcc.gov/ecfs/document/vie/w?d7520924139</a>	Small operators dispute reasonableness of AT&T's rates
107	Comments of Blanca Telephone Co., WT Docket No 05-265	12/16/11	Blanca Telephone Co	Martyn Roettler	<a href="http://apps.fcc.gov/ecfs/document/vie/w?d7022751021">http://apps.fcc.gov/ecfs/document/vie/w?d7022751021</a>	Small operators dispute reasonableness of AT&T's rates
108	OECD Communications Outlook	07/05/05	OECD	Martyn Roettler	<a href="http://www.oecd.org/sti/broadband/d/communications-outlook.htm">http://www.oecd.org/sti/broadband/d/communications-outlook.htm</a>	International benchmarking of roaming rates
109	Article on AT&T-T-Mobile merger	05/31/11	tnonews.com	Martyn Roettler	<a href="http://www.tnonews.com/2011/05/30/position-to-tt-mobile-deal_if_cows...">http://www.tnonews.com/2011/05/30/position-to-tt-mobile-deal_if_cows...</a>	International benchmarks
110	Article comparing US and EU mobile rates	05/31/13	Naviant	Martyn Roettler	<a href="http://www.naviant.com/insights/2013/mobile-wireless-performance-in-the-eu-the-us/introduction/story/a7781181">http://www.naviant.com/insights/2013/mobile-wireless-performance-in-the-eu-the-us/introduction/story/a7781181</a>	Comparison of US rates to the international benchmarks
111	AT&T article about traffic growth	02/14/12	AT&T	Martyn Roettler	<a href="http://www.attinnovationshare.com/innovation/story/a7781181">http://www.attinnovationshare.com/innovation/story/a7781181</a>	Trends in data usage compared to AT&T's revenues
112	Cisco mobile traffic forecast	07/05/05	Cisco	Martyn Roettler	<a href="http://www.cisco.com/assets/collateral/mobile_forecast_highlights/mobile_index.html">http://www.cisco.com/assets/collateral/mobile_forecast_highlights/mobile_index.html</a>	Trends in data usage compared to AT&T's revenues
113	Comments of Limitless Mobile, WT Docket No 05-265	07/10/14	Limitless Mobile	Martyn Roettler	<a href="http://apps.fcc.gov/ecfs/document/vie/w?d752374933">http://apps.fcc.gov/ecfs/document/vie/w?d752374933</a>	AT&T's roaming rates forcing small carriers to cap usage
114	Vulcan Wireless Ex Parte	12/05/11	Vulcan Wireless	Martyn Roettler	<a href="http://apps.fcc.gov/ecfs/document/vie/w?d7021749274">http://apps.fcc.gov/ecfs/document/vie/w?d7021749274</a>	Band 17 history
115	Vulcan Wireless Ex Parte	12/14/11	Vulcan Wireless	Martyn Roettler	<a href="http://www.fccshareholder.com/download/SABEA_2F03NV/0x0526396f/2365602.e5508.46be_be2c">http://www.fccshareholder.com/download/SABEA_2F03NV/0x0526396f/2365602.e5508.46be_be2c</a>	Band 17 history and relationship between AT&T and Motorola
116	Motorola Annual Report excerpt	06/29/05	Motorola	Martyn Roettler	<a href="http://webapn.etsi.org/3GPPRegistrationReport_on_Form_10-K.pdf">http://webapn.etsi.org/3GPPRegistrationReport_on_Form_10-K.pdf</a>	Report on Form 10-K participation in 3GPP standards process
117	3GPP 2008 Meeting Attendees	06/16/08	ETSI	Martyn Roettler	<a href="http://f3view.Participant/277235">http://f3view.Participant/277235</a>	

Document No	Document/Thing Description	Date Prepared	Author (From)	Recipient(s)	Location	Relevance
118	Article on T-Mobile Spectrum Acquisition	08/12/14	Fiercewireless	Martyn Roetter	<a href="http://www.fiercewireless.com/story/t-mobile-scores-more-700-mhz-block-spectrum-centurylink-unit/2014/08/12">http://www.fiercewireless.com/story/t-mobile-scores-more-700-mhz-block-spectrum-centurylink-unit/2014/08/12</a>	Verizon absence from 700MHz and Band 17
119	FCC 700 MHz rulemaking webpage	07/04/05	FCC	Martyn Roetter	<a href="http://www.fcc.gov/rulemaking/12_69">http://www.fcc.gov/rulemaking/12_69</a>	Small operators raise problems with AT&T in Band 17
120	Article on AT&T LTE deployment	02/10/10	Cellular News	Martyn Roetter	<a href="http://www.cellular-news.com/story/contracts/41880.htm">http://www.cellular-news.com/story/contracts/41880.htm</a>	AT&T influence over Band 17
121	Article on AT&T LTE deployment	02/10/10	Ericsson	Martyn Roetter	<a href="http://www.ericsson.com/news/1382917">http://www.ericsson.com/news/1382917</a>	AT&T influence over Band 17
122	Opposition of AT&T, WT Docket No 05-265	07/10/14	AT&T Mobility	FCC	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521374908">http://apps.fcc.gov/ecfs/document/view?id=7521374908</a>	Reasonableness of AT&T's proposed terms
123	Article on AT&T's use of "super cookies"	11/18/14	TechDirt.com	Martyn Roetter	<a href="https://www.techdirt.com/blog/wireless/articles/2014/11/17/13043829173/at&amp;t-surveillance-of-wimax-users-sneaky-tricks_">https://www.techdirt.com/blog/wireless/articles/2014/11/17/13043829173/at&amp;t-surveillance-of-wimax-users-sneaky-tricks_</a>	AT&T surveillance of WiMAX users
124	Reply Comments of AT&T, WT Docket No 05-265	08/20/14	AT&T Mobility	FCC	<a href="http://apps.fcc.gov/ecfs/document/view?id=7521785721">http://apps.fcc.gov/ecfs/document/view?id=7521785721</a>	Reasonableness of AT&T's proposed terms
125	AT&T Webpage on Internet of Things Business Models	11/21/14	AT&T Mobility	Lowell Feldman	<a href="http://www.att.com/edotenetConnect/getConnected.jsp?primary_id=20008&amp;pageTitle=Control%20Center#BusinessModels">http://www.att.com/edotenetConnect/getConnected.jsp?primary_id=20008&amp;pageTitle=Control%20Center#BusinessModels</a>	AT&T public positions on M2M and Internet of Things distribution